

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

CASE NO.: 1:CR-01-39

UNITED STATES OF AMERICA,

Plaintiff,

vs

HARRY SABOWITZ,

Defendant.

UNOPPOSED MOTION FOR EXTENSION
TO FILE PRETRIAL MOTIONS

COMES NOW the Defendant, HARRY SABOWITZ, by and through his undersigned attorney, and moves this Honorable Court for an Order granting an extension of time to file pretrial motions in this matter, and as grounds for this motion hereby submits the following:

1. That, this Court entered an order on November 14, 2006, ordering the prosecution to provide the discovery within ten (10) days from the date of the order.
2. That, after several requests, undersigned counsel has still not received discovery.
3. That, on December 27, 2006, undersigned counsel was informed by AUSA Christy Fawcett, that the original agent on the case, who is now retired, was supposed to come in and brief the present agent, but unfortunately had an illness in his family.
4. That, it is undersigned counsel's understanding that this is a paper intensive case.

5. That, it is impossible to prepare pretrial motions without having received discovery

WHEREFORE the Defendant, HARRY SABOWITZ, by and through undersigned counsel respectfully requests that this Honorable Court grant a thirty (30) day extension from the date of receipt of discovery in which to file pretrial motions.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished this 2nd day of January, 2007, to Assistant United States Attorney, Christy Fawcett, United States Courthouse, 228 Walnut Street, 2nd Floor, P.O. Box 11754, Harrisburg, PA 17108.

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